

January 26, 2011 Fredrickson Declaration

Exhibit B

Bill date	Attorney	Hours	Hourly rate	Bill date	General nature of work
9/28/2007	jpf	1.6	\$250	\$400.00	Begin drafting complaint; assess agreement between LLC's and individuals
10/20/2007	jpf	4.7	\$250	\$1,175.00	Continue drafting complaint and review with client
11/21/2007	jpf	1.05	\$250	\$262.50	Confirm registration status; finalize complaint, file and serve
1/29/2008	mtg	6.4	\$195	\$1,248.00	Discuss settlement with defendants' counsel and respond to motion to dismiss
	jpf	2.6	\$250	\$650.00	
2/29/2008	jpf	4	\$250	\$1,000.00	Revise and file opposition to motion to dismiss
5/28/2008	jpf	5.2	\$250	\$1,300.00	Consider response to and respond to motion for summary judgment and motion for joinder of plaintiff
6/30/2008	jpf	3.6	\$250	\$900.00	Respond to motion for joinder
2/27/2009	jpf	1.5	\$345	\$517.50	Request for status conference and consider decision on motions
3/31/2009	jpf	12.3	\$345	\$4,243.50	Assess answer and counterclaim and begin brief iso motion to dismiss counterclaims
4/29/2009	jpf	29.85	\$345	\$10,298.25	Assess counterclaim deficiencies; brief and file motion to dismiss; consider basis for claim vs Nightshift
8/31/2009	jpf	29.8	\$345	\$10,281.00	Further response to motion for partial summary judgment; prepare and file reply iso motion to dismiss counterclaim; consider and pursue settlement meeting
11/30/2009	jpf	7.5	\$345	\$2,587.50	Prepare and file amended complaint

12/18/2009	jpf	4.875	\$345	\$1,681.88	Prepare and file briefs opposing motion to dismiss (time reduced by half to reflect the fact that briefing including opposing motion to dismiss filed by Marshall)
2/26/2010	jpf	1.75	\$345	\$603.75	Consider filings by Marshall, Bishop and Nightshift; draft discovery to Marshall, Bishop and Nightshift (time reduced by half in light of work related to Bishop and Marshall)
	jpf	2.375	\$355	\$843.13	
3/31/2010	jpf	4.375	\$355	\$1,553.13	Discovery (time reduced by half in light of work related to Bishop and Marshall)
4/30/2010	jpf	6.875	\$355	\$2,440.63	Motion to compel discovery; research default damages (time on motion to compel time by half in light of work related to Bishop and Marshall)
5/28/2010	jpf	6.75	\$355	\$2,396.25	Research default issues (time reduced by half to reflect work relating to Bishop)
6/30/2010	jpf	6.75	\$355	\$2,396.25	Research default issues
12/14/2010	jpf	6.75	\$355	\$2,396.25	Complete motion for default (1/28 entry reduced by 1/2 to reflect work related to Bishop and Marshall); gather evidence and begin briefing damages on default
1/26/011 WIP report	jpf	18.05	\$355	\$6,407.75	Prepare and file supplemental brief iso statutory damage award; draft declaration iso requested fee award
Total		168.65		\$55,582.25	

mtg	6.4	@	\$195
jpf	22.75	@	\$250
	87.575	@	\$345
	51.925	@	\$355